

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

**FILED**

AUG 03 2021

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY lee DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

WANYA LAMARE HALL and  
JEMARCUS LEE JACKSON,

Defendants.

No.

**CR 21-207 D**

Violations: 21 U.S.C. § 846  
21 U.S.C. § 841(a)(1)  
18 U.S.C. § 922(g)(1)  
21 U.S.C. § 853  
18 U.S.C. § 924(d)  
28 U.S.C. § 2461(c)

**INDICTMENT**

The Federal Grand Jury charges:

**COUNT 1**  
**(Drug Conspiracy)**

From on or about June 28, 2021, through on or about July 2, 2021, in the Western District of Oklahoma and elsewhere,

----- **WANYA LAMARE HALL and**  
**JEMARCUS LEE JACKSON** -----

knowingly and intentionally conspired, combined, confederated, and agreed with each other and others, both known and unknown to the Grand Jury, to interdependently possess with intent to distribute and to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846, the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

**COUNT 2**  
**(Possession of Methamphetamine with Intent to Distribute)**

On or about July 2, 2021, in the Western District of Oklahoma,

----- **JEMARCUS LEE JACKSON** -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

**COUNT 3**  
**(Felon in Possession of Firearm)**

On or about July 2, 2021, in the Western District of Oklahoma,

----- **WANYA LAMARE HALL,** -----

with knowledge that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Smith & Wesson, model SD40 VE, .40 caliber handgun, bearing serial number FBY3198, which was in and affecting interstate commerce in that the firearm had previously crossed state lines to reach the state of Oklahoma.

All in violation of Title 18, United States Code, Section 922(g)(1), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

**FORFEITURE**

The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1 of this Indictment, **WANYA LAMARE HALL and JEMARCUS LEE JACKSON** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Likewise, upon conviction of the offense alleged in Count 2 of this Indictment, **JEMARCUS LEE JACKSON** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

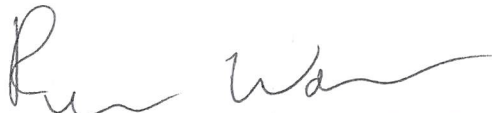
Upon conviction of the of the offense alleged in Count 3 of this Indictment, **WANYA LAMARE HALL** shall forfeit to the United States any and all firearms and ammunition involved in the commission of the offense.

The property subject to forfeiture includes, but is not limited to:

1. approximately \$7,400.00 in U.S. currency;
2. approximately \$30,000.00 in U.S. currency;
3. a Smith & Wesson, model SD40 VE, .40 caliber handgun, bearing serial number FBY3198; and
4. any and all ammunition and magazines not specified herein.

All pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

A handwritten signature in black ink, appearing to read "R. W.", written over a horizontal line.

FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER  
Acting United States Attorney

A handwritten signature in blue ink, appearing to read "T. Leverett", written over a horizontal line.

TRAVIS LEVERETT  
Assistant United States Attorney